

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF RHODE ISLAND

IN RE: Robert D. Barbet

Santander Bank, N.A.

Vs.

Robert D. Barbet

CASE NO. 14-10036-DF  
CHAPTER 13

**RELIEF FROM STAY WORKSHEET - REAL ESTATE**

I, Samone R. Bauer, Bankruptcy Administrator, of Santander Bank, N.A. formerly known as Sovereign Bank, N.A. formerly known as Sovereign Bank (hereinafter, "Movant") hereby declare (or certify, verify, or state):

**BACKGROUND INFORMATION**

1. Real property address which is the subject of this motion: 65 South Comstock Pkwy, Cranston, RI 02921.
2. Lender Name: Santander Bank, N.A.
3. Date of Mortgage: 10/25/2004.
4. Post-Petition payment address: MC: 10-6438-FB7, 601 Penn Street, Reading, PA 19601
5. The manner in which the movant perfected its interest in the property: Recorded mortgage, Assignment of Mortgage
6. All other material liens and encumbrances on the property:

Names of Senior Lien Holder	Amount Due	Source of Information (e.g., Schedules filed by Debtor(s), public records)
N/A	N/A	N/A
Movant's Lien	\$185,839.17	Estimated payoff as of 09/30/2014

Names of Junior Lien Holders	Amount Due	Source of Information
Compass Bank For Savin/bbva Compass	\$94,000.00	Debtor's Schedules

**DEBT/VALUE REPRESENTATIONS**

7. Total pre-petition and post-petition indebtedness of Debtor(s) to Movant at the time of filing the motion: \$185,839.17
8. Movant's estimated market value of the real property: \$ 157,000.00.
9. Source of estimated valuation: Debtor's Schedules.

**STATUS OF DEBT AS OF THE PETITION DATE**

10. Total pre-petition indebtedness of Debtor(s) to Movant as of petition filing date: \$181,398.40
  - A. Amount of principal: \$168,159.98
  - B. Amount of interest: \$5,726.48
  - C. Amount of escrow (taxes and insurance): \$3,991.11
  - D. Amount of forced placed insurance expended by Movant: \$0.00
  - E. Amount of Attorney's fees billed to Debtor(s) pre-petition: \$1,350.00
  - F. Amount of pre-petition late fees, if any, billed to Debtor(s): \$530.28
11. Contractual interest rate: 5.75% - 10/25/2004 - 11/30/2011  
3.125% - 12/01/2011 - present
12. Please explain any additional pre-petition fees, charges or amounts charged to Debtor's/Debtor's account and not listed above: Advertisement costs: \$868.88, Sheriff/auctioneer fees: \$300.00, Title Costs: \$300.00, Property inspections: \$103.50, MLC: \$25.00, Certified mail: \$43.17

**AMOUNT OF ALLEGED POST-PETITION DEFAULT (AS OF 08/19/2014)**

13. Date last payment was received: 03/18/2014
14. Alleged total number of payments post-petition from filing of petition through payment due on

September 30, 2014:

Please list all post-petition payments alleged to be in default:

**SCHEDULE OF PAYMENTS THAT WERE DUE:**

Date Payment Due	Payment Amount Due Post Petition
April 1, 2014	\$1,239.39
May 1, 2014	\$1,239.39
June 1, 2014	\$1,239.39
July 1, 2014	\$1,239.39
August 1, 2014	\$1,239.39
September 1, 2014	\$1,239.39
<b>Total:</b>	<b>\$7,436.34</b>

**SCHEDULE OF PAYMENTS THAT WERE RECEIVED**

Payment Due Date	Amount of Payment Due	Amount of Payment Received	Date Payment Received	Amount Applied to Principal	Amount Applied to Interest	Amount Applied to Escrow	Late Fee Charged if any	Amount Not Applied
02/01/2014	\$1,239.39							
03/01/2014	\$1,239.39							
Totals	\$2,478.78	\$	\$	\$	\$	\$	\$	\$

15. Amount of Movant's Attorneys fees billed to Debtor for the preparation, filing and prosecution of this motion: \$650.00
16. Amount of Movant's filing fee for this motion: \$176.00
17. Other Attorney's fees billed to Debtor post-petition: \$150.00
18. Amount of Movant's post-petition inspection fees: \$0.00
19. Amount of Movant's post-petition appraisal/broker's price opinion: \$0.00

20. Amount of forced placed insurance or insurance provided by the Movant post-petition: \$0.00
21. Sum held in suspense by Movant in connection with this contract, if applicable: \$234.70
22. Amount of other post-petition advances or charges: i.e., taxes, insurance incurred by Debtor, etc.:  
Litigation: \$193.50, Title: \$175.00
23. Amount and date of post-petition payments offered by the debtor and refused by the movant: N/A  
Date(s): N/A

#### REQUIRED ATTACHMENTS TO MOTION

Please attach the following documents to this motion and indicate the exhibit number associated with the documents.

- (1) Copies of documents that indicate Movant's interest in the subject property. For purposes of example only, a complete and legible copy of the promissory note or other debt instrument together with a complete and legible copy of the mortgage and any assignments in the chain from the original mortgagee to the current moving party. (Exhibit \_\_\_\_\_.)
- (2) Copies of documents establishing proof of standing to bring this Motion. (Exhibit \_\_\_\_\_.)
- (3) Copies of documents establishing that Movant's interest in the real property was perfected. For the purposes of example only, a complete and legible copy of the Financing Statement (UCC-1) filed with either the Clerk's Office of the Register or the country the property is located in. (Exhibit \_\_\_\_\_.)

**CERTIFICATION AND DECLARATION FOR BUSINESS RECORDS**

I certify that the information provided in this worksheet and/or exhibits attached to this worksheet is derived from records that were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters, were kept in the course of the regularly conducted activity; and were made by the regularly conducted activity as a regular practice.

I further certify that copies of any transactional documents attached to this worksheet as required by paragraphs 1,2, and 3, immediately above, are true and accurate copies of the original documents. I further certify that the original documents are in movant's possession, except as follows: \_\_\_\_\_.

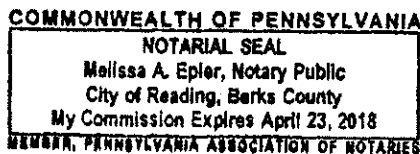
I/we declare (or certify, swear, affirm, verify or state) that the foregoing is true and correct.

Executed on 10/16/2014 [date]

Samore R. Baur  
[Signature]

Bankruptcy Administrator  
[Title]

Subscribed and sworn to before me this 10/16/14 [date]



Melissa A. Epler  
Notary Public: [Name]

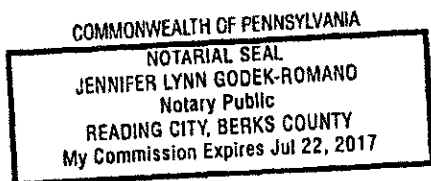
My commission Expires: 4/23/2018  
[Date]

Responses as to Question 6

Samore R. Baur  
[Signature]

Bankruptcy Administrator  
[Title]

Subscribed and sworn to before me this 10/16/14 [date]



[Signature]  
Notary Public: [Name]

My commission Expires: 7/22/17  
[Date]